

CITY OF LOS ANGELES

CALIFORNIA

CITY ETHICS COMMISSION

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CITY ETHICS COMMISSION
200 N. SPRING STREET
CITY HALL - 24TH FLOOR
LOS ANGELES, CA 90012

June 11, 2008

Via Facsimile and First Class Mail

Ross Johnson, Chairman
Fair Political Practices Commission
428 J Street, Suite 620
Sacramento CA 95814

Re: Proposed Regulation 18530.45 (Local Legal Defense Funds)

Dear Chairman Johnson and Members of the Commission:

At its June 10 meeting, the Los Angeles City Ethics Commission considered proposed FPPC Regulation 18530.45, regarding legal defense funds for local candidates and officeholders and urges its adoption. The Commission believes the proposed regulation strikes an appropriate balance between providing a framework for local jurisdictions that do not regulate legal defense funds and preserving local authority for jurisdictions that have legal defense regulations in place.

We understand that the San Diego Ethics Commission has suggested a slight change to the proposed regulation to further clarify a local agency's ability to regulate legal defense funds within its own jurisdiction. Our Commission supports the proposed change and urges its inclusion in the final regulation.

We appreciate the FPPC's work to reach out to local jurisdictions on this issue and to consider the impact of the proposed regulation on existing local regulatory schemes. In particular, we wish to acknowledge and thank FPPC Commission Counsel Emelyn Rodriguez for her collaborative efforts.

Please do not hesitate to contact me at (213) 978-1960 if I can answer any questions or provide any additional information, and thank you for your consideration.

Sincerely,

LeeAnn M. Pelham
Executive Director

cc: Michael Salerno, FPPC Executive Director
Emelyn Rodriguez, FPPC Commission Counsel

